

STEVEN H. FELDERSTEIN, State Bar No. 056978  
PAUL J. PASCUZZI, State Bar No. 148810  
JENNIFER E. NIEMANN, State Bar No. 142151  
FELDERSTEIN FITZGERALD  
WILLOUGHBY & PASCUZZI LLP  
400 Capitol Mall, Suite 1750  
Sacramento, CA 95814  
Telephone: (916) 329-7400  
Facsimile: (916) 329-7435  
sfelderstein@ffwplaw.com  
ppascuzzi@ffwplaw.com  
jniemann@ffwplaw.com

Attorneys for The Roman Catholic Bishop of Stockton,  
a California corporation sole

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

In re:

THE ROMAN CATHOLIC  
BISHOP OF STOCKTON, a  
California corporation sole,  
  
Reorganized Debtor.

CASE NO. 14-20371-C-11

DCN: PSZ-12

Date: April 18, 2017  
Time: 10:30 a.m.  
Courtroom: 35  
501 I Street, 6th Floor  
Sacramento, CA

**REORGANIZED DEBTOR'S STATEMENT REGARDING FINAL FEE  
APPLICATIONS OF THE CHAPTER 11 PROFESSIONALS**

The Roman Catholic Bishop of Stockton, a California corporation sole (the "Reorganized Debtor"), hereby files this statement to inform the Court of the breakdown of the share of the Professional Fee Cap to be paid to the Chapter 11 Professionals (as defined in the confirmed Chapter 11 Plan, Dkt. No. 757) on their final fee applications if all of the requested fees and expenses are approved.

Section 5.2 of the Plan provides that the Reorganized Debtor shall pay all Allowed Professional Fee Claims, subject to the Professional Fee Cap, within five business days of entry of a final order approving such Professional Fee Claims, unless otherwise ordered by the Bankruptcy Court or agreed between the Chapter 11 Professional and the Reorganized Debtor. Section 3.100 of the Plan provides that the Professional Fee Cap means a cap of \$350,000 for all

Professional Fee Claims incurred by the Committee's Professionals and the Debtor's Professionals from the period from April 19, 2016 through the Effective Date (the "Cap Period"). Section 3.99 of the Plan provides that Professional Fee Claims mean the allowed interim and final professional fees and expenses charged by Chapter 11 Professionals. Section 3.23 of the Plan provides that Chapter 11 Professionals means the Debtor's Professionals, the Committee's Professionals and the Future Claims Representative's Professionals

According to the filed fee applications, the professionals in this case billed \$672,904.92 in fees and expenses during the Cap Period as set forth below:

| Professional                                     | Fees and Expenses<br>Subject to Cap |
|--|-------------------------------------|
| Felderstein Fitzgerald Willoughby & Pascuzzi LLP | \$272,771.23                        |
| Pachulski, Stang, Ziehl and Jones LLP            | \$238,533.45                        |
| Neumiller & Beardslee                            | \$90,694.62                         |
| Meredith, Weinstein & Numbers, LLP               | \$54,240.92                         |
| Alix Partners                                    | \$9,194.70                          |
| Berkeley Research Group                          | \$7,470.00                          |
| Greeley Asset Services, LLC                      | \$0.00                              |
| Total  | \$672,904.92                        |

As set forth above, Felderstein Fitzgerald Willoughby & Pascuzzi LLP ("FFWP") billed \$272,771.23 in fees and expenses during the Cap Period. If all of the fees and expenses requested on the final fee applications are approved, each professional will receive 52.01329% of its fees and expenses incurred during the Cap Period. Based on this percentage the Reorganized Debtor calculates that FFWP will receive \$141,877.29 (52.01329% of \$272,771.23 requested) for fees and expenses incurred during the Cap Period.

As set forth above, Pachulski Stang Ziehl & Jones LLP ("PSZJ") billed \$238,533.45 in fees and expenses during the Cap Period. If all of the fees and expenses requested on the final fee applications are approved, each professional will receive 52.01329% of its fees and expenses incurred during the Cap Period. Based on this percentage the Reorganized Debtor calculates that PSZJ will receive \$124,069.10 (52.01329% of \$238,533.45 requested) for fees and expenses incurred during the Cap Period.

As set forth above, Neumiller & Beardslee ("Neumiller") billed \$90,694.62 in fees and

1 expenses during the Cap Period. If all of the fees and expenses requested on the final fee  
2 applications are approved, each professional will receive 52.01329% of its fees and expenses  
3 incurred during the Cap Period. Based on this percentage the Reorganized Debtor calculates that  
4 Neumiller will receive \$47,173.26 (52.01329% of \$90,694.62 requested) for fees and expenses  
5 incurred during the Cap Period.

6 As set forth above Meredith, Weinstein & Numbers, LLP ("MW&N") billed \$54,240.92  
7 in fees and expenses during the Cap Period. If all of the fees and expenses requested on the final  
8 fee applications are approved, each professional will receive 52.01329% of its fees and expenses  
9 incurred during the Cap Period. Based on this percentage the Reorganized Debtor calculates that  
10 MW&N will receive \$28,212.49 (52.01329% of \$54,240.92 requested) for fees and expenses  
11 incurred during the Cap Period.

12 As set forth above, Alix Partners billed \$9,194.70 in fees and expenses during the Cap  
13 Period. If all of the fees and expenses requested on the final fee applications are approved, each  
14 professional will receive 52.01329% of its fees and expenses incurred during the Cap Period.  
15 Based on this percentage the Reorganized Debtor calculates that Alix Partners will receive  
16 \$4,782.47 (52.01329% of \$9,194.70 requested) for fees and expenses incurred during the Cap  
17 Period.

18 As set forth above, Berkeley Research Group ("Berkeley") billed \$7,470.00 in fees and  
19 expenses during the Cap Period. If all of the fees and expenses requested on the final fee  
20 applications are approved, each professional will receive 52.01329% of its fees and expenses  
21 incurred during the Cap Period. Based on this percentage the Reorganized Debtor calculates that  
22 Berkeley will receive \$3,885.39 (52.01329% of \$7,470.00 requested) for fees and expenses  
23 incurred during the Cap Period.

24 The Reorganized Debtor has reviewed the final fee applications filed by all case  
25 professionals for the entire case period to the Effective Date. The amounts are set forth below:

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| Professional                                     | Total Fees Incurred | Total Expenses Incurred | Total Fees and Expenses |
|--|---------------------|-------------------------|-------------------------|
| Felderstein Fitzgerald Willoughby & Pascuzzi LLP | \$774,707.50        | \$29,391.43             | \$804,098.93            |
| Pachulski, Stang, Ziehl and Jones LLP            | \$1,240,427.50      | \$35,098.55             | \$1,275,526.05          |
| Neumiller & Beardslee                            | \$676,741.80        | \$5,131.53              | \$681,873.33            |
| Meredith, Weinstein & Numbers, LLP               | \$186,275.00        | \$2,306.67              | \$188,581.67            |
| Alix Partners                                    | \$126,250.00        | \$2,058.94              | \$128,308.94            |
| Berkeley Research Group                          | \$57,182.00         | \$43.92                 | \$57,225.92             |
| Greeley Asset Services, LLC                      | \$5,889.00          | \$60.50                 | \$5,949.50              |
| Total  | \$3,067,472.80      | \$74,091.54             | \$3,141,564.34          |

Based on the Professional Fee Cap reductions, the Reorganized Debtor calculates that overall, the reduction amounts to \$322,904.92 (\$672,904.92 - \$350,000.00), which is approximately a 10.28% reduction of the total fees incurred in the case.

Dated: April 4, 2017

FELDERSTEIN FITZGERALD  
WILLOUGHBY & PASCUZZI LLP

By: /s/ Paul J. Pascuzzi  
PAUL J. PASCUZZI  
Attorneys for  
The Roman Catholic Bishop  
of Stockton, a California corporation sole